

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION**

JANE DOE #1, and JANE DOE #2, on	)	
behalf of themselves and all others similarly	)	
situated,	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION NO: 7-21-CV-00220 - LSC
v.	)	
	)	
MG FREESITES, LTD, d/b/a	)	
“PORNHUB”, a foreign entity; MG	)	
FREESITES II LTD, a foreign entity,	)	
MINDGEEK S.A.R.L., a foreign entity;	)	
MINDGEEK USA, INCORPORATED, a	)	
Delaware corporation; MG CY	)	
HOLDINGS LTD, a foreign entity;	)	
MINDGEEK CONTENT RT LIMITED, a	)	
Foreign entity; 9219-1568 QUEBEC INC.	)	
d/b/a MINDGEEK, a foreign entity; MG	)	
BILLING LTD, a foreign entity,	)	
	)	
Defendants.		

**MOTION FOR ADMISSION OF ATTORNEY PRO HAC VICE**

Pursuant to Civil Local Rule 83.1(b), the Plaintiffs move for the admission and appearance of attorney Louis C. Bechtle *pro hac vice* in this action. This motion is supported by the Declaration<sup>1</sup> of Louis C. Bechtle filed herewith. This motion is further supported by the consent of the undersigned, Gregory Zarzaur and Joshua P. Hayes, who agree to serve as local counsel for the attorneys admitted *pro hac vice* on behalf of the Plaintiffs in the above-styled matter.

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<sup>1</sup> For privacy reasons, the street number and street name of the applicant attorney’s home address has been redacted. The applicant will submit unredacted home address information should the Court require.

Respectfully submitted this the 25th day of February 2021,

/s/ Gregory Zarzaur

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*Counsel for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on all counsel of record in this matter via the Court's CM/ECF system on this the 25th day of February, 2021.

I hereby further certify that a copy of the foregoing will be served on the Defendants at the time service is perfected.

/s/ Gregory Zarzaur  
OF COUNSEL